



Social Services

Scott M. Matheson, Governor, State of Utah
Anthony W. Mitchell, Ph.D., Executive Director

March 26, 1979

*File in Plateau
Resources Uranium*

mill - Garfield Co.

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ACT/017/016

MEMORANDUM

TO: Lorayne Tempest
State Planning Coordinator's Office

Milo Barney
State Division of Natural Resources

FROM: Richard C. Hansen *RCH*
Associate Deputy Director of Health

SUBJECT: Shootering Canyon Uranium Project

Attached are copies of memoranda from our Bureau of Radiation and Occupational Health, Bureau of Air Quality and Bureau of Solid Waste Management concerning review of the Draft Environmental Statement Related to Operation of Plateau Resources Limited, Shootering Canyon Uranium Project, dated February, 1979, and submitted by the U.S. Nuclear Regulatory Commission.

Although we have been working with Plateau Resources on these matters we suggest that the comments be forwarded to the U.S. Nuclear Regulatory Commission prior to the new April 6, 1979 deadline.

cc: Plateau Resources

mkh

AB



Social Services

Scott M. Matheson, Governor, State of Utah
Anthony W. Mitchell, Ph.D., Executive Director

533-6734
March 23, 1979

MEMORANDUM TO: Richard C. Hansen *RC*
Associate Deputy Director of Health
Environmental Health Services Branch

FROM: Larry F. Anderson, Director *L.F.A.*
Bureau of Radiation and Occupational Health

SUBJECT: Shoterling Canyon E.I.S.

The E.I.S. does not make mention of the requirement for a 3/4 mile buffer zone around tailings areas created by new mills imposed by the Utah State Division of Health. The Bureau of Radiation and Occupational Health feels that this requirement and the method used to meet this policy should be included in the E.I.S.

Division of Health
Environmental Health Services Branch
James D. Clise
Deputy Director of Health

150 West North Temple, Suite 426
P.O. Box 2500, Salt Lake City, Utah 84110
801-533-6121

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AB

From
DEPARTMENT

ALVIN E. RIC RS *LA*

DATE: March 29, 1979

To
DEPARTMENT

RICHARD HANSEN

RE: Shooting Canyon Uranium
Project

ATTENTION:

The draft environmental statement for the Shooting Canyon Uranium Project which was proposed by the U.S. Nuclear Regulatory Commission has been reviewed.

The following comments are submitted:

Plateau Resources Limited submitted plans and specifications together with a notice of intent to erect a uranium mill to the Utah Air Conservation Committee in early 1978. The proposal was evaluated and determined to be consistent with the Utah Air Quality Regulations and the Utah Air Conservation Act in existence at that time.

Section 4(Part 4-2) states that diffusion modeling shows the potential for exceeding the particulate standards during the construction phase. Fugitive dust must be controlled such that a violation of the standard does not occur.

Section 4(Part 4-3) states that the 24 hour PSD increment for particulate is predicted to be exceeded. This statement raises issues as to the applicability of federal PSD requirements which must be resolved with EPA.

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Social Services

Scott M. Matheson, Governor, State of Utah
Anthony W. Mitchell, Ph.D., Executive Director

533-4145
February 28, 1979

MEMORANDUM TO: Richard Hansen, Associate Deputy Director of Health *Rev*
FROM: Dale D. Parker, Ph.D., Director, Bureau of Solid *Waste*
Waste Management
SUBJECT: Plan review - Plateau Resources Limited

In reviewing the Shootering Canyon Uranium project proposal (environmental statement), I found no specific mention or plan submitted for solid waste disposal.

In your transmittal to the responsible contact person, I would appreciate your mentioning the fact that in accordance with the Utah Code of Solid Waste Disposal Regulations, plans for construction and operation of any solid waste disposal facility must be submitted for approval to the Bureau.

Radioactive tailing wastes exempted.

If there are non-radioactive materials to be disposed of, we would like to know about them and about how such wastes will be stored, treated and ultimately disposed of.

The solid waste restrictions needn't hold up plant construction, but will affect waste disposal operations when and if such occur.

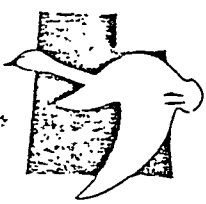
dc

Division of Health
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Handwritten initials 'AB' in a stylized, bold font.



DIVISION OF WILDLIFE RESOURCES

DOUGLAS F. DAY
Director

1596 West North Temple/Salt Lake City, Utah 84116/801-533-9333

March 22, 1979

Ms. Lorayne Tempest
State Planning Office
State Capitol
Salt Lake City, Utah 84114

Dear Ms. Tempest:

We have reviewed the Draft Environmental Statement of Plateau Resources Limited regarding the Shooter Canyon Uranium Project and we do have some concerns related to this project. Following are some general and specific comments.

Off-site impacts to local wildlife populations from the recreational activities of the 500 to 600 new people associated with the mine, uranium mill and Ticaboo could be significant. Currently, 115 people reside at Bullfrog and another 150 at the temporary mine camp. If Ticaboo gains in popularity as a second home area for recreators, the total population of the Bullfrog-Ticaboo area could exceed 1,000 people.

As an overview to the total problem of impacts on wildlands and wildlife associated with outdoor recreation in the Henry Mountains-Bullfrog area, the Shooter Canyon Uranium Project is a significant but probably short-term, negative impact. The recreational housing aspects of Ticaboo or any other recreational housing development near Bullfrog Basin will result in long-term, negative impacts to wildlife. Due to the natural and man-made attractions of the area to recreators, it is inevitable that outdoor recreation will increase and recreational housing projects will continue to be developed regardless of the uranium industry. Wildlife resources will be impacted largely in proportion to such development.

Page 1-1; paragraph 3. It should be more clearly pointed out that the mill operation will last as long as processible uranium is available. *BS*

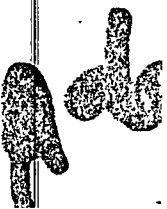
Page 2-11; (2.5.1) paragraph 1. Major land use within a 16-km (10-mile) radius of the project site should include wildlife habitat use areas and not just livestock grazing and recreation.

Page 2-22; (2.9.1.2). The Utah Division of Wildlife Resources has published a List of Vertebrate Wildlife that Inhabit Southeastern Utah (Dalton et al. 1978). The species list identifies and lists phylogenetically the species of wildlife that inhabit the Henry Mountains-Burr Desert portion of

GOVERNOR
Scott M. Matheson

DEPT. OF NATURAL RESOURCES
Gordon E. Harmston
Exec. Director

WILDLIFE BOARD
Lewis C. Smith - Chairman
Roy L. Young
Warren T. Harward
L. S. Skaggs
Chris P. Joullas



southeastern Utah. It also gives their status. The draft for this publication has been available and widely distributed since early 1977. The 28 species identified on page 2-23 and the handful of other species listed on pages 2-23 and 2-24 hardly characterize the 369 species of wildlife found in this general area. Additionally, the status of the several wildlife species identified on page 2-23 is completely unacceptable and misleading. As just one example, the implication that golden eagles are rare is erroneous. Golden eagles are common year-round residents of the area. Field studies conducted during only two months of one year can only be considered as cursory for wildlife species occurrence, abundance and status. Data provided by the aforementioned publication can only be improved upon by site specific, long-term field studies--one-time summer and fall observations are not sufficient for making statements or presentations of the nature displayed in Table 2-10 on page 2-23.

Page 2-23. The Utah Division of Wildlife Resources concedes that the mill site is not located within high-priority (normal) or critical deer winter range. For the purpose of accuracy, high-priority deer winter range is located within eight miles north of the project and the closest crucial-critical winter range for mule deer is approximately 12 miles northwest of the project.

Page 2-24; paragraph 1. The discussion relative to desert bighorn sheep is vague and inaccurate. The Colorado River generally flows from north to south through Utah. As a result, description of locations in relation to the river must be referenced as east or west. Desert bighorn sheep inhabit both the east and west sides of the Colorado River from as far north as Moab to Lake Powell. Desert sheep are also distributed throughout the major drainages along the east side of Lake Powell, south to the San Juan River drainage. They have recently been reintroduced into the Escalante drainage at Moody Canyon and plans exist to transplant desert bighorns onto the Little Rockies as soon as 1979. These areas are on the west side of Lake Powell. The Little Rockies lie adjacent to the project site east of Highway 276.

Page 2-24; paragraph 3. The Hungarian partridge is not known to inhabit the area; however, chukars are common.

The statements concerning waterfowl are poor. The project site lies within the Pacific Flyway. Waterfowl make significant, year-round use of Lake Powell and populations show significant diversity and numbers during spring and fall migrations.

Page 2-24; paragraph 4. The northern bald eagle and American peregrine falcon, both endangered species, are known inhabitants of Lake Powell in the vicinity of Bullfrog and also on the Henry Mountains. The bald eagles are winter residents between November 15 and March 15 each year. Peregrines are year-round residents and are currently known to nest along Lake Powell. Additionally, the spotted owl may inhabit the Henry Mountains. Nesting populations have been verified in Capitol Reef National Monument.

Page 2-24; (2.9.2) paragraph 6. A humpback chub was illegally taken by an angler from the north end of Lake Powell during the summer of 1978. The fish was seized by the Utah Division of Wildlife Resources.

Page 3-22; (3.3.2.2) paragraph 1. It is doubtful if inclusion of sagebrush in the seed list for reclamation is of value; blackbrush seed would be more advisable. The seed mixture should include more than three species. Additionally, the proposed seed list and appropriate substitutes should be part of the draft ES. A good reference source for this information would be the Intermountain Forest and Range Experiment Station, Ephraim, Utah.

Page 4-3; (4.2.1.2) paragraph 5. There are no agricultural lands involved with this project. All of the lands are wildlands characterized as desert shrub and used primarily by wildlife, livestock and outdoor recreators.

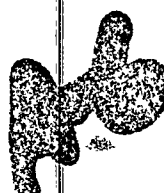
Pages 4-7 and 4-8; (4.6.1). This section provides no reference of impacts to wildlife populations from radiological contamination.

Page 4-9; (4.1). The flow chart for radiological contamination of man should include wildlife as a source of food for man. Hunting is a popular form of outdoor recreation in Utah. Game species of wildlife that may make significant use of the site or adjacent areas are, for the most part, year-round residents--cottontail rabbits, chukar and mule deer. Livestock only use the area during a short period each year. Inclusion of wildlife in the chart would also demonstrate the potential impact on wildlife.

Page 4-13; (4.7.7) paragraph 2. It does not seem reasonable to assume that operations conducted in a manner calculated to be safe for man would be safe for wildlife. People, for the most part, aren't dependent upon plant and animal products generated within the influence zone of the project for their day-to-day survival; local wildlife are dependent upon products (forage and water) from the influence zone for their day-to-day survival.

The draft ES is deficient in showing analysis of potential radionuclide accumulation in local vegetation and the resultant transfer to wildlife species; and, in the instance of game species, the transfer of radionuclides to man. As a result, the assumption that wildlife will be impacted in a similar manner as man is speculative at best.

Page 4-20; (4.8.6) paragraph 6. The draft ES should indicate that disturbance by increased numbers of recreators will make existing habitats in the Bullfrog-Henry Mountain area unacceptable to some wildlife species. Additionally, it should be noted that damage to wildland habitat by ORV's will be long-lasting in alpine and desert biomes of the adjacent areas. Illegal taking of all wildlife will increase with an increase in local human populations and increases in outdoor recreation.



Page 6-5; paragraph 2. It is generally accepted that trapping efforts to document species presence and/or density of small mammals should include, at a minimum, a 7 x 7 square trap grid containing 50 traps and monitored for at least five consecutive days in each habitat type. Sampling should evaluate prebreeding and postbreeding populations. Procedures identified in the draft ES only evaluated postbreeding populations. Many times this meager intensity of effort fails to identify the abundance of a species although it will usually document presence. Based upon the information given in the draft ES, we doubt if adequate baseline information concerning small mammals for comparison in monitoring has been collected. Section 2 of the draft ES does not show results of sampling in terms of abundance and, as pointed out, section 2 has significant errors regarding status of identified species and is questionable concerning presence of species.

The draft ES does not identify if the Emlen Technique was utilized to determine abundance of avifauna other than raptors. For habitat types associated with the mine, Ticaboo and mill site, this is the only acceptable method. A great deal more baseline information than is presented will be required for monitoring purposes.

Similar comments provided for avifauna and mammals can be made for reptiles. It is unlikely that significant representation of amphibians on the project can be documented.

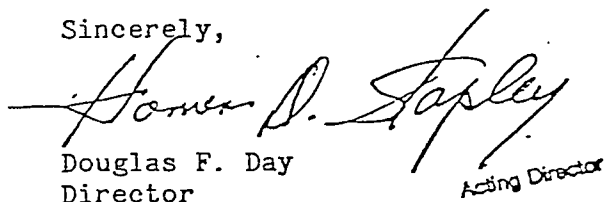
Page 6-5; paragraphs 4, 5 and 7. It would be valuable to collect representative wildlife specimens from the project site prior to development of the mill for radiological evaluation. This would provide an adequate baseline for comparison with a control if needed in the future. The Utah Division of Wildlife Resources should be contacted for appropriate permits to conduct this work. A detailed operational, terrestrial monitoring program should be provided for review and approval by the Utah Division of Wildlife Resources prior to issuance of any permits to construct the mill.

Page 7-2; (7.6.1) paragraph 3. Any losses of wildlife due to radiation contamination would be unavoidable.

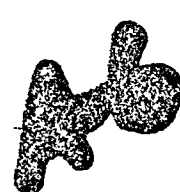
Page 9-1; (9.3.1) paragraph 5. Contamination by radiation of wildlife populations would be irreversible and losses of individuals or populations would be irretrievable.

We appreciate the opportunity to review and comment on this project. If we can be of further assistance, please advise as appropriate.

Sincerely,


Douglas F. Day
Director

Acting Director



STATE OF UTAH

Scott M. Matheson, Governor

DEPARTMENT OF
DEVELOPMENT SERVICES

J. Phillip Keene III
Executive Director
104 State Capitol
Salt Lake City, Utah 84114
Telephone: (801) 533-5961

February 14, 1979

Chairperson
Environmental Coordinating Committee
State Planning Office
118 State Capitol
Salt Lake City, Utah 84114

RE: Draft Environmental Statement relating to the Shoshone Canyon
Uranium Project, Garfield County
Dear Chairperson:

On the basis of staff review and recommendation, the State Historic Preservation Officer has determined that although a known site(s) exists in the project area, the proposed project will have no known effect on any recognized or potential National Register historical, archeological, or cultural site(s). Please be advised, however, that should artifacts or cultural objects be discovered during the construction stage, it is the responsibility of the Federal agency or a community receiving block grant funds to notify this office immediately as provided for in the Utah State Antiquities Act of 1973 and Public Law 93-291.

Should you need assistance or clarification, please call Wilson G. Martin, Preservation Development Coordinator, State Historical Society, 307 West 200 South, Salt Lake City, Utah 84101, 533-6017.

Sincerely,



J. Phillip Keene, III
Executive Director and
State Historic Preservation Officer

WGM:pc:B599:WN

cc: Ross A. Scarano, Section Leader, Uranium Mill Licensing Section, Fuel Processing & Fabrication Branch, Division of Fuel Cycle & Material Safety, United States Nuclear Regulatory Commission, Washington, D.C. 20555
(2) clearance.

COMMENTS ON THE
PLATEAU RESOURCES LIMITED
SHOOTERING CANYON URANIUM PROJECT

The Utah Energy Office has reviewed the draft environmental statement relating to the operation of Plateau Resources Limited Shootering Canyon Uranium Project. We find no significant environmental impacts, provided that the project meets all requirements established by the Utah State Division of Health. We hope that review of this project can proceed quickly and that the required permits will be issued soon.

AKU